

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MONIQUE DA SILVA MOORE,	)	
MARYELLEN O'DONOHUE,	)	
LAURIE MAYERS, HEATHER	)	
PIERCE, and KATHERINE	)	
WILKINSON on behalf of themselves	)	Civ No. 11-CV-1279 (RJS) (AJP)
and all others similarly situated,	)	
	)	
PLAINTIFFS,	)	
	)	
v.	)	
	)	
PUBLICIS GROUPE SA and	)	
MSLGROUP,	)	
	)	
DEFENDANTS.	)	
	)	

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**DECLARATION OF SIHAM NURHUSSEIN IN SUPPORT OF PLAINTIFFS' RULE  
72(a) OBJECTION TO MAGISTRATE JUDGE PECK'S  
JANUARY 4, 2012 DISCOVERY RULINGS**

SIHAM NURHUSSEIN, an attorney duly admitted to practice law in the State of New York, in the Southern District of New York, states as follows:

1. My firm represents the Plaintiffs in the above-referenced action.
2. Annexed to this declaration as "Exhibit A" is a true and correct copy of Plaintiffs' Request for Pre-Motion Conference Regarding Plaintiffs' Proposed Motion to Compel Discovery, dated December 27, 2011.
3. Annexed to this declaration as "Exhibit B" is a true and correct copy of Plaintiffs' Request for Pre-Motion Conference Regarding Plaintiffs' Proposed Motion for Sanctions, dated December 29, 2011.
4. Annexed to this declaration as "Exhibit C" is a true and correct copy of the transcript of the January 4, 2012 conferences before Judge Peck.

5. Annexed to this declaration as "Exhibit D" is a true and correct copy of an organizational chart produced by Defendant MSLGroup, Bates Stamp MSL000821.

I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: January 18, 2012

New York, New York

/s/ Siham Nurhussein

Siham Nurhussein